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October 25, 2013

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: MB Docket No. 12-108

Dear Ms. Dortch:

On October 24, 2013, Charles Crawford, Vice-Chair of the Montgomery County Commission on People with Disabilities,¹ Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI),² Cheryl A. Heppner, Executive Director, Northern Virginia Resource Center for Deaf and Hard of Hearing Persons,³ Mitsuko Herrera, Special Advisor for Broadband Plans, Policy, and Special Projects for

¹ Mr. Crawford is also a member of the board of the Equal Rights Center, President of the American Council of the Blind for Maryland, and Second Vice-President of the Guide Dog Users Inc. Mr. Crawford previously served as Executive Director of the American Council of the Blind and worked with the FCC on descriptive video service issues.

² Mr. Stout is also President of Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN). Prior to joining TDI, Mr. Stout served for five years as Assistant Director for Community Affairs with the North Carolina Division of Services for the Deaf and the Hard of Hearing, sixteen months as Executive Director of the Missouri Commission for the Deaf, ten years as Assistant Executive Director for Business Services of the National Association of the Deaf, and a year as Instructor in the Department of Business Administration at Gallaudet University.

³ Mrs. Heppner is also Vice-President Deaf and Hard of Hearing Consumer Advocacy Network(DHHCAN). She also represents Association of Late-Deafened Adults, Inc. DHHCAN is a national coalition consisting of twelve regular members with the national consumer organizations of, by, and for the deaf and hard of hearing, and four affiliate members from the nonprofit/business sectors. The twelve national consumer organizations are: Alexander Graham Bell Association for the Deaf and Hard of Hearing (AGBell), American Association of the Deaf-Blind (AADB), Association of Late-Deafened Adults (ALDA), Deaf and Hard of Hearing in Government (DHHIG), Deaf Seniors of America (DSA), American Society for Deaf Children (ASDC), Cerebral Palsy and Deaf Organization (CPADO), Gallaudet University Alumni Association (GUAA), Hearing Loss Association of America (HLAA), National Association of the Deaf (NAD), National Black Deaf Advocates (NBDA), and Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI). The four affiliate members are: American Deafness and Rehabilitation Association (ADARA), Communication Service for the Deaf (CSD), Conference of Educational Administrators of Schools and Programs for the Deaf (CEASD), and Registry of Interpreters for the Deaf, Inc. (RID).

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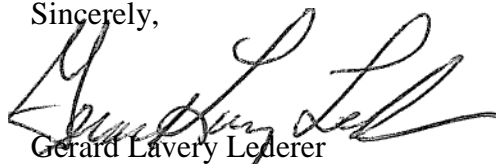
Montgomery County and the undersigned in his role as counsel for Montgomery County, Maryland, and the City of Boston, Massachusetts, met with the Sarah Whitesell, Legal Advisor to Acting Chair Clyburn and Brendan Murray, the Media Bureau Liaison to the Chair's Office to discuss the importance of the Commission's implementation of Sections 204 and 205 of the Twenty-First Century Communications and Video Accessibility Act of 2010 ("CVAA").

Our conversations focused on the Commission's legal authority to require, and the meeting participants' need for, the depiction of individual program information on public, educational, and government ("PEG") access channels in the electronic program guides (EPGs) of all multichannel video program distributors (MVPDs) that carry PEG access channels.

- Messrs. Crawford and Stout and Mrs. Heppner described the unique barriers faced by their communities as a predicate for Commission action.
- Mr. Stout made numerous references to DHHCAN's ex parte, which was filed on September 23 in this proceeding.
- Mr. Stout questioned why the Commission would not implement the recommendation of the technical committee on Section 204/205 developments (specifically inclusion of channel names, program names, program descriptions, and accessibility features).
- Mr. Crawford highlighted that this proceeding is fundamentally about choice and consumers need information to make choices.
- Ms. Herrera referenced Montgomery County's prior ex parte filings on the Commission's legal authority to act.

Please direct any questions to the undersigned.

Sincerely,


Gerard Lavery Lederer
for BEST BEST & KRIEGER LLP

Attorney for Montgomery County, MD

cc: Sarah Whitesell
Brendan Murray